

SAMUEL BERNARD JOHNSON III
4420 Abruzzi Circle
Stockton, California 95206
(209) 982-5904 – Telephone
blakviii@aol.com – Email

Plaintiff - *In Pro Se*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III,

Plaintiff,

vs.

CHEVRON CORPORATION, a Delaware
corporation, CHEVRON
ENVIRONMENTAL MANAGEMENT
COMPANY, a California corporation, and
DOES 1-10, inclusive

Defendants

Case No.: C 07-05756 SI (JSC)

**PLAINTIFF'S MOTION TO COMPEL
DISCOVERY FROM DEFENDANTS
CHEVRON CORPORATION, CHEVRON
ENVIRONMENTAL MANAGEMENT
COMPANY, THEIR ATTORNEY OF
RECORD AND REQUEST FOR
SANCTIONS**

DATE: Friday, September 12, 2008

TIME: 9:30 a.m.

COURTROOM: A, 15th Floor

JUDGE: Hon. Magistrate Joseph C. Spero

1 Samuel Bernard Johnson III, (hereinafter referred to as "Plaintiff Johnson") hereby
2 moves the Court for an order to to compel discovery from Defendants Chevron Corporation,
3 Chevron Environmental Management Company, Their Attorney of Record and Request for
4 Sanctions. The Order is needed in order for Defendants Chevron Corporation, Chevron
5 Environmental Management Company and their attorney of record to produce discovery that will
6 lead to admissible evidence in this action as well as will assist the parties in calculating damages.

7 Pursuant to the Honorable Magistrate Judge Joseph C. Spero's July 29, 2008, Order
8 Plaintiff Johnson is providing an explanation as to why the withheld discovery as referenced in
9 his July 10, July 15 and July 16, 2008, letter briefs to the Court should be compelled to be
10 produced from the Defendants Chevron Corporation, Chevron Environmental Management
11 Company and their attorney of record in this action. Given the breadth of withheld discovery,
12 nearly twenty-five discovery requests, responses and supplemental and amended responses this
13 motion is the best vehicle to address this discovery dispute to the Court.

14 /s/

15 Dated this 4th day of August 2008

SAMUEL BERNARD JOHNSON III